

Here are my comments on RM-11306 as proposed by the ARRL.

Regulation of HF bands by bandwidth can be ok except too much area (3.5 khz) in my opinion  
is being assigned to so called semi automatic controlled stations.

No distinction is being made between Auto (unattended control) 3.5 KHZ and Semi Auto ,  
500 KHZ.

The League wants to remove the bandwidth limit on quasi semi auto stations.

This will result in wide band auto digital stations occupying almost 80 percent of our  
Amateur bands...

Supposedly these stations will detect activity before they transmitt.. But they only detect  
activity in their near coverage area and probably won't detect activity hundreds of miles  
away  
thereby taking over frequencies already in use.

In fact the detection of activity or listen before transmitting in response to request to  
transmitt has  
not been perfected to prevent taking over of frequencies already in use by other modes.

I strongly urge the commission to continue the current limitations or consider semi auto  
control  
the same as automatic control., limit the lower 40 khz of 160 meters to 500 hz. and limit  
bandwidth  
on 30 meters to 500 HZ

Please keep Voice sub bands at 3725 to 4000 khz on 80 meters and 7150 to 7300 khz on 40  
meters.

Respectively,

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